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Attorneys for Defendants
WELLS FARGO & COMPANY, WACHOVIA MORTGAGE
CORPORATION, WACHOVIA BANK, N.A., WACHOVIA
SECURITIES, LLC, WACHOVIA SECURITIES FINANCIAL
NETWORK, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JORGE V. RAGDE, JR. AND JENNIFER J.
RAGDE, On Behalf of Themselves and All
Others Similarly Situated,

Plaintiff,

v.

WELLS FARGO & COMPANY, WACHOVIA
MORTGAGE CORPORATION, WACHOVIA
BANK, N.A., WACHOVIA SECURITIES, LLC,
WACHOVIA SECURITIES FINANCIAL
NETWORK, LLC, WACHOVIA
CORPORATION, and DOES 1-10 Inclusive,

Defendants.

Case No. C 09-0226-SI

**STIPULATION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME TO
RESPOND TO COMPLAINT AND
VACATING INITIAL CASE
MANAGEMENT CONFERENCE
AND RELATED DEADLINES**

WHEREAS, on February 18, 2009, the parties submitted an amended stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to April 2, 2009;

WHEREAS, on March 30, 2009, the parties submitted a second stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to May 4, 2009;

WHEREAS, on April 30, 2009, the parties submitted a third stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to June 8, 2009;

1 WHEREAS, on June 4, 2009, the parties submitted a fourth stipulation to extend the
2 defendants' time to respond to plaintiffs' initial complaint to July 8, 2009;

3 WHEREAS, the Initial Case Management Conference in this matter is currently scheduled
4 for Friday, August 7, 2009 at 2:30 p.m.;

5 WHEREAS, the Parties' Rule 26(f) Report and Joint Case Management Statement are
6 currently due July 31, 2009, 7 days prior to the Initial Case Management Conference;

7 WHEREAS, the Parties are currently required to file ADR Certifications and a Stipulation
8 to ADR Process or Notice of Need for ADR Phone Conference by Friday, July 17, 2009, 21 days
9 prior to the Initial Case Management Conference;

10 WHEREAS, the Parties, through their counsel, have reached an agreement in principle to
11 settle this matter and are in the process of drafting the settlement documentation;

12 IT IS HEREBY STIPULATED AND AGREED pursuant to Local Rule 6-1(a), and
13 Federal Rule of Civil Procedure 12(a), by and between plaintiffs Jorge V. Ragde, Jr. and Jennifer
14 J. Ragde and defendants Wells Fargo & Company, Wachovia Mortgage Corporation, Wachovia
15 Bank, N.A., Wachovia Securities, LLC, Wachovia Securities Financial Network, LLC, Wachovia
16 Corporation, through their respective attorneys, that the time by which defendants may plead or
17 otherwise respond to the Complaint shall be extended to and include **Friday, August 7, 2009**.

18 IT IS FURTHER STIPULATED AND AGREED pursuant to Northern District Local
19 Rules 6-2(a), 7-12, and 16-2(e), that the Initial Case Management Conference currently scheduled
20 for **Friday, August 7, 2009**, and all other case management deadlines, shall be vacated, pending
21 final resolution of this matter.
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1 Dated: July 6, 2009

JEFFREY F. KELLER
DENISE L. DÍAZ
KELLER GROVER LLP.

2 By /s/ Jeffrey F. Keller
Jeffrey F. Keller

3
4 Attorneys for Individual and Representative
Plaintiff JORGE V. RAGDE, JR. and JENNIFER
J. RAGDE

5 Dated: July 6, 2009

JAMES R. McGUIRE
NATALIE NAUGLE
MORRISON & FOERSTER LLP

6 By /s/ James R. McGuire
James R. McGuire

7 Attorneys for Defendant WELLS FARGO &
COMPANY, WACHOVIA MORTGAGE
CORPORATION, WACHOVIA BANK, N.A.,
WACHOVIA SECURITIES, LLC, WACHOVIA
SECURITIES FINANCIAL NETWORK, LLC,
WACHOVIA CORPORATION

8 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

9 Dated:

10 By: 
Judge Susan Illston

11 The initial case management conference has been continued to Friday,
12 August 21, 2009, at 2:30 p.m.

GENERAL ORDER 45 ATTESTATION

In accordance with General Order 45, concurrence in the filing of this document has been obtained from Jeffrey F. Keller and I shall maintain records to support this concurrence for subsequent production for the court if so ordered or for inspection upon request by a party.

Date: July 6, 2009

By /s/ James R. McGuire

James R. McGuire

Attorneys for Defendant WELLS FARGO &
COMPANY, WACHOVIA MORTGAGE
CORPORATION, WACHOVIA BANK, N.A.,
WACHOVIA SECURITIES, LLC, WACHOVIA
SECURITIES FINANCIAL NETWORK, LLC,
WACHOVIA CORPORATION